

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

CHARLENE CARTER, §
§
§
Plaintiff, § **Civil Action No. 03:17-cv-02278-X**
v. §
§
SOUTHWEST AIRLINES CO., AND §
TRANSPORT WORKERS UNION §
OF AMERICA LOCAL 556, §
§
Local 556s. §

DEFENDANT TWU LOCAL 556's WITNESS LIST

Pursuant to the Court's Amended Scheduling Order and Local Rule 26.2, Defendant TWU Local 556 ("556"), files its witness list as follows:

Witness Name	Narrative summary of testimony	Whether Witness was Deposed	Witness Appearance at Trial
Charlene Carter	Charlene Carter is the Plaintiff. She will testify about her correspondence and interactions with Audrey Stone, the representation she received from the Union during the grievance procedure, her AFO history, the recall petition, and her post Southwest work history and damages.	Yes	Probable
Audrey Stone	Audrey Stone is a current Southwest flight attendant and the former president of Local 556. Stone has knowledge of the complaints to Southwest about Carter's conduct towards her, specifically Carter sending her videos and photographs including videos of aborted fetuses.	Yes	Probable

Mike Sims	Mike Sims was the director of inflight services for Southwest at the time of Carter's termination from employment' Sims presided over the step 2 grievance hearing and affirmed the decision to terminate Carter's employment. Sims also has knowledge of the "last chance agreement" offered to Carter to reinstate her employment at Southwest and the arbitration hearing following the step 2 grievance hearing. Mike Sims also has knowledge pertaining to the Union's ability to impact Southwest's decision to terminate Plaintiff.	Yes	Probable
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Dated: June 9, 2022

Respectfully submitted,

/s/ Edward B. Cloutman, III
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ATTORNEYS FOR DEFENDANT TWU LOCAL 556

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing document has been filed via the Court's ECF system and all counsel of record have been served on this 9th day of June, 2022.

/s/ Adam S. Greenfield
Adam S. Greenfield